

IN THE UNITED STATES DISTRICT COURT FOR  
THE WESTERN DISTRICT OF OKLAHOMA

1. CITIZEN POTAWATOMI COMMUNITY )  
DEVELOPMENT CORPORATION, )

Plaintiff(s), )

Case No. CIV-24-662-JD

v. )

1. NATHAN O. BEAUCHAMP; )

2. ADA OUTDOORS, LLC., an Oklahoma )  
limited liability company; )

3. SHAWNEE OUTDOORS, LLC, an )  
Oklahoma limited liability company; )

4. BOARD OF COUNTY COMMISSIONERS )  
OF PONTATOC COUNTY; )

5. TREASURER OF PONTOTOC COUNTY; )

6. CAPITOL SERVICES, LLC, an Oklahoma )  
corporation; )

7. CATERPILLAR FINANCIAL SERVICES )  
CORPORATION, a foreign corporation; )

8. CITIZENS BANK OF ADA, an Oklahoma )  
banking corporation; )

9. CORPORATION SERVICE COMPANY, a )  
foreign corporation; )

10. FIRST UNITED BANK AND TRUST )  
CO., an Oklahoma banking corporation; )

11. HUNTINGTON DISTRIBUTION )  
FINANCE, a foreign corporation; )

12. MAGOO FINANCIAL, a foreign )  
corporation; )

13. OKLAHOMA HERITAGE BANK, an )  
Oklahoma banking corporation; )

14. TCF INVENTORY FINANCE, a foreign )  
corporation; )

15. THE UNITED STATES SMALL )  
BUSINESS ADMINISTRATION, )

Defendant(s). )

**NOTICE OF REMOVAL TO THE  
UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF OKLAHOMA**

TO THE HONORABLE JUDGES OF THE UNITED STATES  
DISTRICT COURT FOR THE WESTERN DISTRICT OF OKLAHOMA:

Assistant United States Attorney Kay Sewell respectfully represents the following:

1. U.S. Small Business Administration (hereinafter “SBA”) is a United States Government Agency named as an entity that may be entitled to recovery in this foreclosure action. This notice of removal involves a civil action pending in the District Court of Oklahoma County, State of Oklahoma styled *Citizen Potawatomi Community Development Corporation v. Nathan O. Beauchamp, et al.*; Case No. CJ-2024-141. No trial has occurred in this matter. Pursuant to 28 U.S.C. §§ 1442, 1446 and Local Civil Rule 81.2, attached are copies of all process, pleadings, and orders served upon the United States Attorney’s Office for the Western District of Oklahoma in this action. (*See* Ex. 1 (Summons); Ex. 2 (Petition); and Ex. 3 (Copy of OSCN Docket Sheet from Pottawatomie County)).

2. The Petition filed in this action asserts the Defendant Nathan O. Beauchamp, in his personal capacity and as a member of the limited liability companies named as Defendants, made, executed and delivered to Plaintiff certain Promissory Notes and Real Estate Mortgages as described in the Petition (Exh. 2, Petition).

3. Defendant Beauchamp and the limited liability companies have defaulted on said notes and mortgages.

4. SBA’s claim in this matter is considered to be secured and entitled to priority distribution.

5. This action is removable to this Court pursuant to 28 U.S.C. § 1442(a)(1) because the lawsuit involves a claim by U.S. Small Business Administration, an agency of the United States. Pursuant to the provisions of 28 U.S.C. § 1442(a)(1), the United States gives notice that the above-referenced action, now pending in the District Court of Pottawatomie County, State of Oklahoma, is hereby removed to this Court.

DATED this 28<sup>th</sup> day of June, 2024.

ROBERT J. TROESTER  
United States Attorney

s/ KAY SEWELL  
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United States Attorney's Office  
Western District of Oklahoma  
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### **CERTIFICATE OF SERVICE**

x I hereby certify that on June 28, 2024, this document was submitted as an initiating document pursuant to ECF Policies & Procedures Manual, § II.A.2., to the following email new cases email address: [newcases@okwd.uscourts.gov](mailto:newcases@okwd.uscourts.gov) and that all initiating documents are attached as separate pdf files.

x I hereby certify that on June 28, 2024, I served the attached Notice of Removal by U.S. Mail on the following counsel:

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The Board of County Commissioners of  
Pontotoc County  
100 W. 13<sup>th</sup>  
Ada, OK 74820

Corporation Service Company  
c/o United States Corporation Company  
10300 Greenbriar Place  
Oklahoma City, OK 73159

Corporation Service Company  
c/o United States Corporation Company  
801 Adlai Stevenson Drive  
Springfield, IL 62703

First United Bank and Trust Co.  
c/o Spend Life Wisely Company, Inc.  
1400W. Main  
Durant, OK 74701

Huntington Distribution Finance  
c/o CT Corporation System  
1833 South Morgan Road  
Oklahoma City, OK 73128

Magoo Financial  
13943 Irvine Blvd, #85  
Irvine, CA 92602

Oklahoma Heritage Bank  
c/o R. Darryl Fisher  
515 S. Hickory  
Roff, OK 74865

Paula Hall, Treasurer of Pontotoc  
County  
100 W 13th  
Ada, Oklahoma 74820

TCF Inventory Finance  
c/o CT Corporation System  
1833 South Morgan Road  
Oklahoma City, OK 73128

*s/ Kay Sewell*  
Assistant U.S. Attorney

**Exhibits:**

Exhibit 1 - State Court Summons (Pottawatomie County)

Exhibit 2 - Petition (Pottawatomie County)

Exhibit 3 - Pottawatomie County OSCN Docket Sheet for CJ-2024-141